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**REMARKS**

Applicants respectfully present Claims 1-30 for examination in the RCE filed herewith. Claims 1 and 13 have been amended herein to more clearly define the scope of the presently claimed invention. No new claims have been submitted and no new matter has been introduced. Applicants respectfully submit that the claims and remarks presented herein overcome the Examiner's rejections in the Final Office Action dated January 3, 2005 in the parent application.

**35 U.S.C. §103**

Claims 1-30 stand rejected under 35 U.S.C. §103 as being unpatentable over the combination of U.S. Publication No 2002/0144083 ("Wang") in view of U.S. Patent No. 5,926,819 ("Doo"). Applicants respectfully traverse the Examiner's rejection.

Wang describes "software-based speculative pre-computation and multithreading" (Wang, title) while Doo teaches "in-line triggers" (Doo, title). The Examiner concedes that Wang does not explicitly disclose "selecting an entry in a trigger table, the entry associated with the trigger instruction and entry is referenced by the trigger table". The Examiner suggests, however, that it would have been obvious to one of ordinary skill in the art to combine the teachings of Wang with Doo to do so.

Again, Applicants strongly disagree with the Examiner's contention that these references may be properly combined. The Examiner suggests that since both Wang and Doo are "computer related inventions" and "both disclose multithreaded triggers", they are not non-analogous. Applicants respectfully submit that this statement is erroneous. The mere fact that both the references are "computer related" does not automatically render them analogous. The term "computer related" covers essentially any and all inventions that involve a computer system and Applicants cannot fathom that any and all inventions that are "computer related" are by default analogous art.

Similarly, the Examiner suggests that the term "multithreaded triggers" appears in the abstract of both references and that this phrase, in conjunction with the fact that the references are "computer related" renders these references to be in analogous areas of art. Again, Applicants strongly disagree. The term "multithreaded triggers" does not appear

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anywhere in Doo, Doo merely refers to “triggers” and/or “in-line triggers”. Applicants submit the abstract in Wang indicates that “triggers” may be used by speculative threads to spawn other speculative threads (Wang, Abstract). The concept of “triggers” in the Wang context is described further as:

“In one embodiment, an event triggers the invocations and execution of a pre-computation slice as a speculative thread that pre-computes the address accessed by a load of interest.... Speculative threads may be spawned under one of two conditions: when encountering a basic trigger, which occurs when a designated instruction in the main thread is retired, or when encountering a chaining trigger, when one speculative thread explicitly spawns another speculative thread.”

Wang, Col. 3, paragraph 47.

The abstract in Doo, on the other hand, describes an in-line trigger (not a multithreaded trigger, as the Examiner states), which it goes on to define as “a modular, compiled, template trigger, which defines a series of actions to be performed when an operation is applied to a body of data”. (Doo, Abstract). Triggers are further defined in Doo as follows:

“According to industry standards, events that cause triggers to be activated (or “fired”) are DML (Data Manipulation Language) statements. Thus, triggers may be designed to fire when a row of a database table is updated, inserted, or deleted. Accordingly, an individual trigger is typically associated with one database table. The series of actions specified by a trigger is typically written as instructions in a high-level database language such as SQL and PL/SQL, an extension of SQL available from Oracle Corp. of Redwood Shores, Calif. In conformance with industry standards, these instructions must be able to access the data values of table columns corresponding to an affected row before the triggering DML statement was applied (the “old values”) and after the modification was applied (the “new values”).”

(Doo, Col. 1, lines 12-27).

Applicants respectfully contend that the term “triggers” as used within Doo refers to very specific events that conform to industry standards. These types of triggers cannot be confused with the triggers described in Wang above because the triggers in Wang are described as events that “trigger invocation and execution of a pre-computation slice as a speculative thread that pre-computes the address accessed by a load of interest.” (Wang,

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Col. 3, paragraph 47). Applicants therefore respectfully submit again that Wang and Doo are non-analogous areas of art that use the term "trigger" to mean very different things.

Furthermore, as can be expected from references in non-analogous areas of art, there is no suggestion in either reference for such a combination. As set out in M.P.E.P. § 706.02(j), "(t)here must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." Applicants strongly disagree that that there is any such motivation in the present case. The Examiner states that it would have been obvious to combine Wang with Doo to render other elements of the claimed invention unpatentable because "one of ordinary skill in the art would be motivated to select an entry in a trigger table to replicate the trigger instructions as suggested by Doo". Applicants respectfully submit that this does not suggest a motivation, merely a result. There is no teaching in either Wang or Doo to actually suggest this combination. As previously stated, the mere fact that the combination *may* provide an advantage does not *prima facie* mean that the combination is obvious. In the present case, as discussed in greater detail above, there is no teaching in either reference to suggest that it would have been obvious to one of ordinary skill in the art to combine the references in the manner described by the Examiner. Applicants therefore respectfully submit once again that the combination of these references is improper and respectfully request the Examiner to withdraw the 35 U.S.C. § 103 rejections to Claims 1-30.

Even assuming *arguendo* these references were properly combined, Applicants respectfully submit that the combination of Wang and Doo does not render Claims 1-30 unpatentable. As previously stated, the Examiner concedes that Wang does not explicitly teach significant the element of "selecting an entry in a trigger table, the entry associated with the trigger instruction and the entry is referenced by the trigger table." The Examiner suggests, however, that these elements are taught by Doo and that it would have been obvious to one of ordinary skill in the art to incorporate the method of selecting the trigger from the table as taught by Doo in the method of executing code, as taught by Wang. Applicants respectfully disagree.

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First, Applicants submit that the section of Doo highlighted by the Examiner (Doo, Col. 6, lines 30-31) does not teach “selecting an entry in a trigger table”. Rather, this section states “Finally, the database system sets a trigger flag, associating that trigger with the table in the data dictionary, to indicate that the in-line trigger is to fire for the table (step 204).” “Associating a trigger with a table” cannot be reasonably construed to mean “selecting an entry in a trigger table”. The Examiner has made no showing that associating a trigger with a table can be stretched to include “selecting an entry in a trigger table”. Instead, the Examiner states that “the combination of Wang and Doo actually do suggest the limitation “selecting an entry in a trigger table” would be the same as associating the trigger with the table... otherwise how one would select an entry without associating it.” (Office Action, Page 10). Applicants fail to understand the Examiner’s logic in arriving at this conclusion. Doo describes setting a trigger flag, associate the trigger with a table to indicate that the *trigger is to fire for the table*. The table in Doo does not constitute a “trigger table” as claimed, but rather a trigger that fires *for* a table. In contrast, the claimed element states “selecting an entry in a trigger table, the entry associated with the trigger instruction”. Doo therefore does not, alone or in combination with Wang, teach or suggest this element.

Similarly, the Examiner suggests that Doo teaches the element of “entry is referenced by the trigger table” (Doo, Col. 6, lines 57-58, referred to on Page 3 of the Office Action). Applicants respectfully point out that the element of the claim, in full, reads “executing an auxiliary code referenced by the entry in the trigger table” and that Doo does *not* teach this element. There is no mention in Doo of any type of auxiliary code. The section highlighted by the Examiner (Col. 6, lines 57-58) states “[T]he resulting cursor should include memory or a reference to memory for trigger-type specific parameters.” Nothing in this language teaches or suggests any of the elements of the claimed invention, i.e., this language does not teach or suggest a trigger table, the element of “selecting an entry in a trigger table” and/or that the “[auxiliary code reference by the] entry is associated with a trigger instruction.”

The Examiner states later in the Office Action that “for the limitation of ‘auxiliary code’, this limitation has been rejected using the reference Wang not Doo.” Applicant respectfully submits that similar to Doo, nothing in Wang can be read to teach the

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element of "executing an auxiliary code referenced by the entry in the trigger table". Specifically, regardless of whether Wang teaches executing auxiliary code, there is no teaching in either Doo or Wang of the element of "a trigger table". As a result, there is no way for one of ordinary skill in the art based on Doo and/or Wang to implement a "trigger table" having "entries associated with the trigger instruction". Since Doo and/or Wang does not teach or suggest a trigger table having entries associated with the trigger instruction, neither reference can possibly teach "executing auxiliary code *referenced by the entry in the trigger table.*" The Examiner states that "one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references." Applicants' respectfully submit that the arguments above refer to the combination of Wang and Doo. Specifically, Doo, alone or in combination with Wang, does not teach a trigger table or the element of "selecting an entry in a trigger table". Additionally, neither Doo nor Wang, alone or in combination teach the element of "executing auxiliary code *referenced by the entry in the trigger table.*"

In summary, Applicants respectfully submit that Wang and/or Doo, alone or in combination, do not teach or suggests the necessary elements to render the claimed invention unpatentable. Applicants therefore respectfully submit that neither of these references renders independent Claims 1, 13, 15, 22, 24 and 29 unpatentable. Similarly, the references cannot render all claims dependant on these independent claims unpatentable. Applicants therefore respectfully request the Examiner to withdraw the rejection to Claims 1-30 under 35 U.S.C. § 103.

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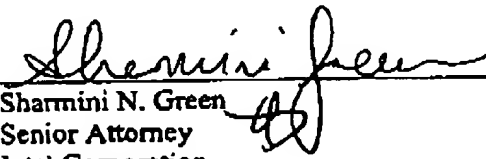
**CONCLUSION**

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1-30 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (310) 406-2362.

If there are any additional charges, please charge Deposit Account No. 50-0221.

Respectfully submitted,

Dated: March 30, 2005

  
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